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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ANGEL FRALEY; PAUL WANG; SUSAN
MAINZER; JAMES H. DUVAL, a minor, by
and through JAMES DUVAL, as Guardian
ad Litem; and WILLIAM TAIT, a minor, by
and through RUSSELL TAIT, as Guardian
ad Litem; individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

FACEBOOK, INC., a corporation; and
DOES 1-100,

Defendants.

Case No. CV 11-01726 LHK PSG

**DECLARATION OF STEVEN R.
WEINMANN IN SUPPORT OF
REQUEST FOR ORDER
SHORTENING TIME FOR
MOTION FOR PROTECTIVE
ORDER**

Courtroom: 5

Judge: Hon. Paul S. Grewal

Trial Date: December 3, 2012

**DECLARATION OF STEVEN R. WEINMANN IN SUPPORT OF REQUEST FOR
ORDER SHORTENING TIME FOR MOTION FOR PROTECTIVE ORDER
CASE # CV 11-01726 LHK PSG**

1 I, Steven R. Weinmann, hereby state and declare:

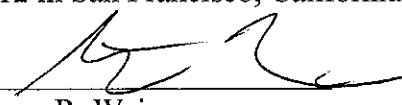
2 1. I am an attorney licensed to practice before all the courts of the State of California as
3 well as the District Court for the Northern District of California, and am Of Counsel
4 to The Arns Law Firm, one of the attorneys for Plaintiffs herein. I make this
5 Declaration in support of the Stipulation Requesting Order Shortening Time for
6 Motion for Protective Order.

7 2. The Plaintiffs in the action are to file their Motion for Class Certification on or
8 before March 8, 2012, and Defendants are to file their Opposition on or before
9 March 29, 2012. Plaintiffs intend to file a motion to dismiss Ms. Fraley from the
10 action, and she will not be offered as a class representative in that motion.
11 Facebook, Inc. has requested her deposition on February 17, 2012 notwithstanding
12 this intention to dismiss her from the case, and Plaintiffs oppose the taking of the
13 deposition.

14 3. The parties wish to have this dispute resolved promptly, in order that Facebook may
15 seek information it asserts is necessary to its opposition to the class certification
16 motion. Defendant Facebook has agreed to postpone the deposition of Ms. Fraley
17 pending a ruling by the Court on Plaintiff's Motion for Protective Order. Plaintiffs
18 have in exchange stipulated to produce Ms. Fraley for her deposition within 14 days
19 of the issuance of an Order commanding that such deposition go forward.

20 4. There have been no previous time modifications in this case with respect to this
21 motion. There have been previous requests enlarging the time for Facebook, Inc. to
22 respond to Plaintiffs' Complaint, and for Plaintiffs to respond to Facebook's first
23 Motion to Dismiss. The granting of this Order Shortening Time would not have any
24 effect upon the schedule in this case.
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1 I declare under the penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct, and that if called upon to testify, I could verify the accuracy of the
3 same. This document was executed on February 13, 2012 in San Francisco, California.
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